



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•NJ0002185965

INSTALLATION ADDRESS

DU PONT E I DE NEMOURS & CO
GRASSELLI PLANT
LINDEN

NJ 07036

GRASSELLI PLANT
LINDEN

NJ 07036

Print or type with ELITE type (12 characters/inch) in the unshaded areas only.

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

I. INSTALLATION'S EPA I.D. NO.

II. NAME OF INSTALLATION

G. C. ZARNAS & CO., INC.

III. INSTALLATION MAILING ADDRESS

850 JENNINGS ST.

IV. LOCATION OF INSTALLATION

BETHLEHEM, PA 18017

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

F N J D 0 0 2 1 8 5 9 1 6 5

I. NAME OF INSTALLATION

E I DUPONT DE NEMOURS & COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 GRASSELLI PLANT

CITY OR TOWN

ST.

ZIP CODE

4 LINDEN

NJ

07036

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 SAME

CITY OR TOWN

ST.

ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 GUST C ZARNAS PRESIDENT

215.866.0923

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 E I DUPONT DE NEMOURS & COMPANY

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F - FEDERAL
M - NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete Item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete Item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

X. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>Gust C. Zarnas</i>	NAME & OFFICIAL TITLE (type or print) GUST C. ZARNAS PRESIDENT	DATE SIGNED 4/30/86
------------------------------------	--	------------------------



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

AUG 07 1990

Mr. Harry W. McDowell
E.I. Dupont de Nemours
Foot of S. Wood Avenue
Linden, New Jersey 07036

Re: E.I. Dupont de Nemours
EPA I.D. No. NJD002185965

Dear Mr. McDowell:

Your submittal in response to the warning letter dated June 9, 1990 has been deemed satisfactory. Your facility has been entered in our Data Management System as having achieved physical compliance with the violation cited in the above referenced letter. This matter can now be considered concluded and the enforcement action resolved.

Please be advised your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste. Subsequently, if your facility should be found in violation of the regulation in the future, you may be subject to escalated enforcement action, including monetary penalties. If you have any questions contact James Sullivan at (212) 264-6150.

Sincerely yours,


George Meyer, P.E., Chief
Hazardous Waste Compliance Branch

cc: Wayne Howitz, Assistant Director
Hazardous Waste Enforcement Element
New Jersey Department of Environmental Protection
401 East State Street
Trenton, New Jersey 08625-0028



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

GRASSELLI PLANT
LINDEN, NEW JERSEY 07036

CHEMICALS AND PIGMENTS DEPARTMENT

March 7, 1981

Mr. Julio Morales-Sanchez
Director, Enforcement Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Morales-Sanchez:

In reply to your letter of February 27, 1981, this DuPont site is not and has not been a hazardous waste treatment, storage, or disposal (TSD) facility under the Resource Conservation and Recovery Act (RCRA). We checked Box 59 on the Notification of Hazardous Waste Activity form because this facility produces Sulfuric Acid in bulk. Therefore, we anticipated that acidic residues would accumulate in the storage tanks and would have to be removed and disposed of whenever the tanks were cleaned. Cleaning generally takes place at 10 to 20 year intervals.

On October 30, 1980, EPA published an exclusion (Part 261.4(c)) for such activities in the Federal Register, 45 FR 72028, 10/30/80. Also any hazardous wastes that may be generated will be removed from this site within 90 days; thus, no application for Permit Part A was submitted.

If you require any additional information please contact me at (201) 862-1500.

Very truly yours,

Harry W. McDowell
Harry W. McDowell
Environmental Coordinator

PAB
MAR 19 2 41 PM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

HWM/jew



E. I. DU PONT DE NEMOURS & COMPANY

INCORPORATED

GRASSELLI PLANT

LINDEN, NEW JERSEY 07036

CHEMICALS AND PIGMENTS DEPARTMENT

March 7, 1981

Mr. Julio Morales-Sanchez
Director, Enforcement Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Morales-Sanchez:

In reply to your letter of February 27, 1981, this DuPont site is not and has not been a hazardous waste treatment, storage, or disposal (TSD) facility under the Resource Conservation and Recovery Act (RCRA). We checked Box 59 on the Notification of Hazardous Waste Activity form because this facility produces Sulfuric Acid in bulk. Therefore, we anticipated that acidic residues would accumulate in the storage tanks and would have to be removed and disposed of whenever the tanks were cleaned. Cleaning generally takes place at 10 to 20 year intervals.

On October 30, 1980, EPA published an exclusion (Part 261.4(c)) for such activities in the Federal Register, 45 FR 72028, 10/30/80. Also any hazardous wastes that may be generated will be removed from this site within 90 days; thus, no application for Permit Part A was submitted.

If you require any additional information please contact me at (201) 862-1500.

Very truly yours,

Harry W. McDowell
Environmental Coordinator

HWM/jew



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

26 FEDERAL PLAZA

NEW YORK, NEW YORK 10278

February 27, 1980

Dear Sir:

The United States Environmental Protection Agency ("EPA") regulates the handling of hazardous wastes under the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq. Section 3010(a) of RCRA, 42 U.S.C. §6930(a) requires that any parties handling certain quantities of hazardous wastes notify EPA of their activities within 90 days of the promulgation of regulations identifying such substances.

Regulations defining a hazardous waste under RCRA were initially promulgated on May 19, 1980 (45 Fed. Reg. 33063 et seq.) (with several subsequent amendments). As a result, all hazardous waste facilities were required to notify EPA of their activity by August 18, 1980. In addition, the regulations, which went into effect on November 19, 1980, required that all hazardous waste treatment, storage, or disposal ("TSD") facilities submit a Part A Permit Application by that date. Compliance with the above notification and application requirements is mandatory before EPA can confer interim status hazardous waste authority, and Section 3005 of RCRA, 42 U.S.C. §6925 expressly prohibits the operation of a hazardous waste TSD facility without such authority.

Records available to this office indicate that you have complied with the notification requirements of Section 3010 of RCRA and are identified as an operator of a TSD facility. You have failed, however, to submit the necessary Part A Permit Application. As such, any treatment, storage, or disposal of hazardous waste which has occurred at your facility since November 19 is in violation of the regulations, and therefore subject to enforcement action under Section 3008 of RCRA, 42 U.S.C. §6928. Violators of RCRA may incur penalties of as much as \$25,000 per day of violation.

If you are no longer operating a hazardous waste TSD facility, or if your original notification was incorrect, please inform us of that fact, as well as the date you ceased operation, so that we can update our records. If you are still operating a TSD facility, you must apply for a permit by completing the enclosed application forms and submitting them within 30 days to:

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

308

YES	NO	DON'T KNOW
-----	----	---------------

- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

—	X	—
---	---	---

Please explain: *Company representative was aware of the difference.*

- c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

None

- d. Describe the activities that result in the generation of hazardous waste.

At times DuPont will accept products back from customer that are off-specification for possible recycle or resale; Sometimes these materials are declared waste.

- (2) Is hazardous waste stored on site? *Not Currently*

—	—	—
---	---	---

- a. What is the longest period that it has been accumulated?

less than 90 day after 11/19/80

- b. Is the date when drums were placed in storage marked on each drum?

X	—	—
---	---	---

- (3) Has hazardous waste been shipped from this facility since November 19, 1980?

X	—	—
---	---	---

- a. If "yes," approximately how many shipments were made?

Four

- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? *Four*

- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?

X	—	—
---	---	---

- b. If "no" or "don't know," please elaborate.

	<u>YES</u>	<u>NO</u>	<u>DON'T KNOW</u>
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number	<u>X</u>	—	—
- the generator's name, mailing address, telephone number, and EPA identification number	<u>X</u>	—	—
- the name, and EPA identification number of each transporter	<u>X</u>	—	—
- the name, address and EPA identification number of the designated facility and an alternate facility, if any: <u>No Alternate</u>	<u>X</u>	—	—
- a description of the wastes (DOT)	<u>X</u>	—	—
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	<u>X</u>	—	—
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	<u>X</u>	—	—
(5) Were there any hazardous wastes stored on site at the time of the inspection?	—	<u>X</u>	—
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?	<u>N/A</u>	—	—
b. If not properly packaged or in secure tanks, please explain.			
c. Are containers clearly marked and labelled?	—	—	—
d. Do any containers appear to be leaking?	—	—	—
e. If "yes," approximately how many?			

Yes No

- *(6) Has the generator submitted an annual report to EPA covering the previous calendar year?

N/A —

a. How do you know?

- (7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?

✓ — —

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

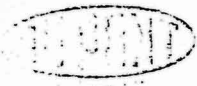
N/A — —

- (8) General comments.

This plant notified as A TSD facility however as stated in the enclosed letter Dated March 7, 1981 it is currently only a generator.

Information on hazardous waste handling after Nov. 19, 1980 is provided in the enclosed letter dated March 6, 1981.

* The effective date for this requirement is March 1, 1982.



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

GRASSELLI PLANT
LINDEN, NEW JERSEY 07036

CHEMICALS AND PIGMENTS DEPARTMENT

March 6, 1981

Mr. Julio Morales-Sanchez
Director, Enforcement Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Morales-Sanchez:

As you requested in your letter of February 22, 1981, we have enclosed the information relative to our handling of hazardous wastes since November 19, 1980. We also have included hazardous wastes which was generated prior to November 19, 1980, but which was transported for disposal during the time period specified in the reference letter.

Very truly yours,

Robert H. Akins
Plant Manager

RHA/jhw
Enc.

E. I. DU PONT DE NEMOURS & CO. - GRASELLI PLANT

LINDEN, NEW JERSEY

1. Hazardous Wastes Generated Since November 19, 1980

- A. Chemical Name: 40% Dimethylamine Solution
Quantity: 20,352 Pounds (Includes weight of 48 drums)
Date Generated: Not generated on plant. Returned drums from formulator. After careful evaluation for recovery, decision made to dispose of material. Declared waste on December 19, 1980.
- B. Chemical Name: Chlorosulfonic Acid
Quantity: 140,000 Pounds
Date Generated: Off-grade material collected for recycle or sale. When sale contracts failed to materialize, decision made to dispose of material. Declared waste on January 28, 1981.

1a. Hazardous Wastes Generated Prior To November 19, 1980

- A. Chemical Name: Methoxychlor
Quantity: 14,748 Pounds
Date Generated: Mid 1970's
- B. Chemical Name: Acetonitrile
Quantity: 5,280 Pounds
Date Generated: Early 1970's
- C. Chemical Name: Strontium Nitrate
Quantity: 4,739 Pounds
Date Generated: Mid 1970's

2. Hazardous Wastes Removed from Premises Since
November 19, 1980

A. Type of Waste: Methoxychlor; Solid in Drums

Quantity: 14,748 Pounds

Date Removed: January 7, 1981

Transporter:

Name: Devcon Trucking

Address: Flanders, New Jersey

EPA ID No.: NJ D 000692061

TSD Facility:

Name: Cecos International, Inc.

Address: Williamsburg, Ohio 45176

EPA ID No.: OH D 087433744

Date Brought to TSD: January 8, 1981

B. Type of Waste: Acetonitrile, Liquid in Drums

Quantity: 5,280 Pounds

Date Removed: December 11, 1980

Transporter:

Name: Du Pont Trucking

Address: New Castle, Delaware

EPA ID No.: DE T 110010055

TSD Facility:

Name: Rollins Environmental Service (NJ) Inc.

Address: Rte. 322 West
Bridgeport, New Jersey 08014

EPA ID No.: NJ D 063288239

C. Type of Waste: Strontium Nitrate; Solid in Drums

Quantity: 4,739 Pounds

Date Removed: February 18, 1981

Transporter:

Name: E. I. du Pont de Nemours & Co.

Address: Airport & Schley Roads
New Castle, Delaware 19810

EPA ID No.: DE T 110010055

TSD Facility:

Name: E. I. du Pont de Nemours & Co.

Address: River Road
LaPlace, Louisiana

EPA ID No.: LA D 001890367

3. Hazardous Wastes Still on Premises

A. Chemical Name: 40% Dimethylamine Solution

Quantity: 20,352 Pounds (Gross: Includes weight
of 48 drums)

Status: Will be removed from premises within
90 days from date on which the material
was declared a "waste".

B. Chemical Name: Chlorosulfonic Acid

Quantity: 140,000 Pounds

Status: Will be neutralized in enclosed pipe.



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
GRASSELLI PLANT
LINDEN, NEW JERSEY 07036

CHEMICALS AND PIGMENTS DEPARTMENT

May 29, 1981

Dr. Richard A. Baker
Permits Administration Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

RE: NJD002185965

Dear Dr. Baker:

As we discussed with Mr. Harry Ruisi this morning, we
replied to your letter of February 27, 1981 on March 7, 1981
(copy of our reply attached).

If you require any further clarification, please contact
me at (201) 862-1500.

Very truly yours,

Harry W. McDowell
Environmental Coordinator

HWM/jhw
Attach.

RECEIVED
JUN 1 12 04 PM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

Handwritten in red:
R&D, TSD
delete
File



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

GRASSELLI PLANT
LINDEN, NEW JERSEY 07036

CHEMICALS AND PIGMENTS DEPARTMENT

March 7, 1981

Mr. Julio Morales-Sanchez
Director, Enforcement Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Mr. Morales-Sanchez:

In reply to your letter of February 27, 1981, this DuPont site is not and has not been a hazardous waste treatment, storage, or disposal (TSD) facility under the Resource Conservation and Recovery Act (RCRA). We checked Box 59 on the Notification of Hazardous Waste Activity form because this facility produces Sulfuric Acid in bulk. Therefore, we anticipated that acidic residues would accumulate in the storage tanks and would have to be removed and disposed of whenever the tanks were cleaned. Cleaning generally takes place at 10 to 20 year intervals.

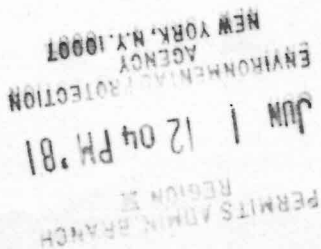
On October 30, 1980, EPA published an exclusion (Part 261.4(c)) for such activities in the Federal Register, 45 FR 72028, 10/30/80. Also any hazardous wastes that may be generated will be removed from this site within 90 days; thus, no application for Permit Part A was submitted.

If you require any additional information please contact me at (201) 862-1500.

Very truly yours,

Harry W. McDowell
Environmental Coordinator

HWM/jew



✓
Gregory Helpern

Baker
119 Liberta Drive, Toms River N.J. 08757
Daggett
Missy Gatti
cc: Casper/Action
Bauer
Lufly

NJD002185965

April 17, 1987

Christopher Daggett
EPA Administrator
26 Federal Plaza
New York, N.Y. 10007

Re: E. I. du Pont & Co.

Response due
5/12/87
Direct Reply

Dear Mr. Daggett:

I understand that the above firm has asked for permits to renew their expired or about to expire dumping permits for two plants, namely Edge Moor in Delaware and Grasselli in Linden, NJ.

As one who was very active with the O.C.C.C.W. in Toms River in the case of Ceiba Geigy, and having seen the positive results, at least partially, in public pressure achieving what the DEP and the EPA had not been able to accomplish, I urge you to deny the permits requested.

I know you are aware of the problems all industries face in disposing of their chemical and toxic wastes. It is your responsibility to act as needed in order to prevent further dumping that would increase the problem rather than satisfy industry's need for decreasing their cost of removing their wastes.

Whatever action you take will set a positive, or negative example of the EPA's intentions to clean up our polluters and prevent increased damage. In all good conscience, you cannot leave this world without feeling sure that you have done everything within your power to leave it in better shape than you found it!

It does not make sense for people like myself, even though I am retired, to fight for a clean environment, protect our ground water, and even our lives (as in the case of the Phosgene at the Ciba Geigy plant) and achieve our goal locally while another group creates new problems for this or some other generation.

Thank you for your consideration.

Cordially yours,

Greg Helpern
Greg Helpern

RECEIVED
APR 21 1987
U.S. E.P.A.
WASHINGTON, D.C.

Baker
Daggett
message
cc: Casper/Action
Baker
Lufkin
Daggett
message
cc: Casper/Action
Baker
Lufkin

Gregory Helpern

119 Liberta Drive, Toms River N.J. 08757

NJD002185965

April 17, 1987

Christopher Daggett
EPA Administrator
26 Federal Plaza
New York, N.Y. 10007

Re: E. I. du Pont & Co.

Dear Mr. Daggett:

I understand that the above firm has asked for permits to renew their expired or about to expire dumping permits for two plants, namely Edge Moor in Delaware and Grasselli in Linden, NJ.

As one who was very active with the O.C.C.C.W. in Toms River in the case of Ciba Geigy, and having seen the positive results, at least partially, in public pressure achieving what the DEP and the EPA had not been able to accomplish, I urge you to deny the permits requested.

I know you are aware of the problems all industries face in disposing of their chemical and toxic wastes. It is your responsibility to act as needed in order to prevent further dumping that would increase the problem rather than satisfy industry's need for decreasing their cost of removing their wastes.

Whatever action you take will set a positive, or negative example of the EPA's intentions to clean up our polluters and prevent increased damage. In all good conscience, you cannot leave this world without feeling sure that you have done everything within your power to leave it in better shape than you found it!

It does not make sense for people like myself, even though I am retired, to fight for a clean environment, protect our ground water, and even our lives (as in the case of the Phosgene at the Ciba Geigy plant) and achieve our goal locally while another group creates new problems for this or some other generation.

Thank you for your consideration.

Cordially yours,

Greg Helpern
Greg Helpern

APR 21 1987
U.S. DEPT. OF JUSTICE
ENVIRONMENTAL PROTECTION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

JUL 09 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7/16 Spoke with Harry McDowell
Explained what we needed
As a response

Mr. Thomas A. Jerrell
Operations Manager
E. I. Dupont de Nemours
Foot of S. Wood Avenue
Linden, New Jersey 07036

Re: E. I. Dupont de Nemours
EPA I.D. No. NJD002185965

Dear Mr. Jerrell:

This Warning Letter is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA") 42 U.S.C. §§ 6901, 6928.

Pursuant to HSWA, EPA promulgated regulations on November 7, 1986, which prohibited the land disposal of restricted waste. 51 Fed. Reg. 40,572 (November 7, 1986). These regulations are published in 40 C.F.R. Part 268, and amend various sections of 40 C.F.R. Parts 260-265 and 270. They became effective on November 8, 1986.

The State of New Jersey is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal restrictions ("LDR").

On or about April 24, 1990, a duly authorized representative of EPA conducted an inspection of E. I. Dupont de Nemours, Linden, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. During this inspection, the inspector noted that:

1. 40 C.F.R. § 268.7(a)(1) which is one of the provisions of the LDR, has been violated. Section 268.7(a)(1) requires the following:

Before a generator offers waste subject to the LDR to a treatment facility, the generator must notify the treatment facility in writing of the appropriate treatment standards set forth in Subpart D of 40 C.F.R. Part 268

The notice must include the following information:


- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standards and all applicable prohibitions set forth in § 268.32 or RCRA Section 3004(d);
- (iii) The manifest number associated with the shipment of waste; and
- (iv) Waste analysis data, where available.

At the time of the above referenced inspection, seven manifest copies were found to be without the required LDR notifications. Be advised that EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 C.F.R. Part 268. You must submit, within thirty (30) days of the receipt of this letter, documentation, and a description of the actions you have taken to correct the violations noted above and to implement the regulations published in 40 C.F.R. Part 268.

Failure to comply with the requirements of this Warning Letter may subject you to penalties of up to twenty-five thousand dollars (\$25,000) for each day of noncompliance in accordance with Section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this matter, please contact Mr. James Sullivan, at (212) 264-6150.

Sincerely yours,


George C. Meyer, P.E., Chief
Hazardous Waste Compliance Branch

cc: Wayne Howitz, Assistant Director
Hazardous Waste Enforcement Element
New Jersey Department of Environmental Protection
401 East State Street
Trenton, New Jersey 08625-0028

bcc: L. Livingston, PAB
G. Meyer, AWM-HWC
J. Sullivan, AWM-HWC



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

GRASSELLI PLANT
LINDEN, NEW JERSEY 07036

CHEMICALS AND PIGMENTS DEPARTMENT

July 17, 1990

Mr. James Sullivan
Hazardous Waste Compliance Branch
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Re: Certified Letter, GCM-TAJ (Du Pont), 7/9/90
EPA I.D. No. NJD002185965

Dear Mr. Sullivan:

As we discussed via telephone on July 16, 1990, we took immediate remedial action to correct the violations noted during the inspection of April 24, 1990. Six(6) Land Disposal Restriction Notification forms were forwarded to the Du Pont Chambers Works Plant on May 17, 1990, for wastes transported to that facility for disposal (copies attached). One(1) Land Disposal Restriction Notification form was forwarded to the Du Pont Belle Plant on May 23, 1990, for a waste transported to that facility for disposal (copy attached).

The plant manager of our Linden facility has reassigned hazardous waste responsibilities to assure implementation and complete compliance of the regulations published in 40 C.F.R. Part 268.

If you have any questions, kindly contact Harry McDowell at (201) 474-1772.

Sincerely,

Harry W. McDowell

HWM/jhw
Attach.



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

CC: M.P. O'Brien
T.A. Jerrell

CHEMICALS AND PIGMENTS DEPARTMENT

Grasselli Plant
May 23, 1990

Steve Hallock
AG
Belle Plant
Belle, West Virginia

LAND DISPOSAL RESTRICTION NOTIFICATION

We enclose a Land Disposal Restriction Notification for a waste that we had transported to Belle for disposal on 4/12/89. The form was inadvertently omitted from the manifest.

If you have any questions, contact H. McDowell on Ducom 8-862-1772.

Harry W. McDowell
Harry W. McDowell

HWM/jhw
Enc.

ATTACHMENT 1

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

GENERATOR: E.I. du Pont de Nemours & Co., Grassell DU PONT APPROVAL NUMBER: OWI 8903
 EPA ID NUMBER: NJD 002185945 Plant MANIFEST NUMBER: NJA 0541360
 WASTE NAME: Waste Methanol / Water
 WASTE ANALYSIS DATA: ATTACHED ☒ NOT AVAILABLE FOR THIS SHIPMENT

In accordance with 40 CFR 268, which governs the land disposal of certain untreated hazardous wastes this form is submitted to Du Pont Environmental Services. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

☒ I am a generator of a hazardous waste, identified above, that does not meet the applicable prohibition levels for "California List" wastes as set forth in 40 CFR 268.32 or RCRA section 3004. This notification is to inform Du Pont Environmental Services that I am sending Du Pont this waste stream, and this waste is prohibited from land disposal until the applicable prohibition levels shown below are met.

☐ Liquid hazardous waste having a pH \leq 2.0.

☒ F003 - Methanol on Solvent list (Methanol not used as "solvent")
 Liquid hazardous wastes containing the following metals (or elements) or compounds at concentrations greater than or equal to those specified below:

- ☐ Arsenic(as As) \geq 500 mg/l
- ☐ Cadmium (as Cd) \geq 100 mg/l
- ☐ Chromium (as Cr VI) \geq 500 mg/l
- ☐ Lead (as Pb) \geq 500 mg/l
- ☐ Mercury (as Hg) \geq 20 mg/l
- ☐ Nickel (as Ni) \geq 134 mg/l
- ☐ Selenium (as Se) \geq 100 mg/l
- ☐ Thallium (as Th) \geq 130 mg/l

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

(2) ☒ This notification is to inform Du Pont that they are receiving the waste identified above which is a "California List" hazardous waste that has been treated to meet the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Harry W. McDowell
 SIGNATURE

Senior Consultant
 TITLE

5/17/90
 DATE



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

CC: M.P. O'Brien
T.A. Jerrell

CHEMICALS AND PIGMENTS DEPARTMENT

Grasselli Plant
May 17, 1990

Barbara Boggs
C&P Dept.
Chambers Works WWTP(0)

LAND DISPOSAL RESTRICTION NOTIFICATION

As we discussed via telephone on May 2, we are enclosing six(6) Land Disposal Restriction Notification forms for wastes transported to your treatment plant 1987-89. The forms were inadvertently omitted from the manifests.

If you have any questions, contact Harry W. McDowell at Ducom 8-862-1772.


Harry W. McDowell

HWM/jhw
Enc.

SUMMARY OF WASTES

<u>Contract No.</u> <u>Seal No.</u>	<u>Description</u>	<u>Date Shipped</u>	<u>Date Received</u>
OW 622-001 Seal #270356	Waste Sulfuric Acid	8/14/87	8/14/87
OW 622-002 Seal #270076	Waste Sulfuric Acid	8/20/87	8/20/87
OW 057-126 Seal #244585	Waste Inhibited Hydrochloric Acid	10/28/87	10/28/87
OW 057-127 Seal #244581	Waste Inhibited Hydrochloric Acid	10/29/87	10/29/87
OW 057-063 Seal #315143	Waste Inhibited Hydrochloric Acid	10/25/88	10/25/88
OW 057-0024 Seal #385138	Waste Inhibited Hydrochloric Acid	10/5/89	10/5/89

ATTACHMENT 1

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

GENERATOR: E.I. du Pont de Nemours & Co. Grasselli DU PONT APPROVAL NUMBER: OW 622
DATE: NUMBER: NJD 002185965 Plant MANIFEST NUMBER: NJA 0353411
WASTE NAME: Waste Sulfuric Acid
WASTE ANALYSIS DATA: ATTACHED ☒ NOT AVAILABLE FOR THIS SHIPMENT

In accordance with 40 CFR 268, which governs the land disposal of certain untreated hazardous wastes this form is submitted to Du Pont Environmental Services. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

☒ I am a generator of a hazardous waste, identified above, that does not meet the applicable prohibition levels for "California List" wastes as set forth in 40 CFR 268.32 or RCRA section 3004. This notification is to inform Du Pont Environmental Services that I am sending Du Pont this waste stream, and this waste is prohibited from land disposal until the applicable prohibition levels shown below are met.

☒ Liquid hazardous waste having a pH \leq 2.0.

Liquid hazardous wastes containing the following metals (or elements) or compounds at concentrations greater than or equal to those specified below:

- ☐ Arsenic (as As) \geq 500 mg/l
- ☐ Cadmium (as Cd) \geq 100 mg/l
- ☐ Chromium (as Cr VI) \geq 500 mg/l
- ☐ Lead (as Pb) \geq 500 mg/l
- ☐ Mercury (as Hg) \geq 20 mg/l
- ☐ Nickel (as Ni) \geq 134 mg/l
- ☐ Selenium (as Se) \geq 100 mg/l
- ☐ Thallium (as Th) \geq 130 mg/l

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

- (2) ☒ This notification is to inform Du Pont that they are receiving the waste identified above which is a "California List" hazardous waste that has been treated to meet the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

SIGNATURE

TITLE

DATE

006472:05/18/89

Harry W. McDowell

Senior Consultant

5/17/90

ATTACHMENT 1

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

GENERATOR: E.I. du Pont de Nemours & Co. Grasselli DU PONT APPROVAL NUMBER: OW 622
DATE: NJD 002185965 ^{Plant} MANIFEST NUMBER: NJA 0353412
WASTE NAME: Waste Sulfuric Acid
WASTE ANALYSIS DATA: ATTACHED ☒ NOT AVAILABLE FOR THIS SHIPMENT

In accordance with 40 CFR 268, which governs the land disposal of certain untreated hazardous wastes this form is submitted to Du Pont Environmental Services. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

☒ I am a generator of a hazardous waste, identified above, that does not meet the applicable prohibition levels for "California List" wastes as set forth in 40 CFR 268.32 or RCRA section 3004. This notification is to inform Du Pont Environmental Services that I am sending Du Pont this waste stream, and this waste is prohibited from land disposal until the applicable prohibition levels shown below are met.

☒ Liquid hazardous waste having a pH \leq 2.0.

Liquid hazardous wastes containing the following metals (or elements) or compounds at concentrations greater than or equal to those specified below:

<input type="checkbox"/>	Arsenic (as As) \geq 500 mg/l
<input type="checkbox"/>	Cadmium (as Cd) \geq 100 mg/l
<input type="checkbox"/>	Chromium (as Cr VI) \geq 500 mg/l
<input type="checkbox"/>	Lead (as Pb) \geq 500 mg/l
<input type="checkbox"/>	Mercury (as Hg) \geq 20 mg/l
<input type="checkbox"/>	Nickel (as Ni) \geq 134 mg/l
<input type="checkbox"/>	Selenium (as Se) \geq 100 mg/l
<input type="checkbox"/>	Thallium (as Th) \geq 130 mg/l

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

(2) ☒ This notification is to inform Du Pont that they are receiving the waste identified above which is a "California List" hazardous waste that has been treated to meet the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Harry W. McDowell Senior Consultant
SIGNATURE TITLE

5/17/90
DATE

ATTACHMENT 1

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

GENERATOR: E.I. du Pont de Nemours & Co. Grasselli Plant DU PONT APPROVAL NUMBER: OW 057
EPA ID NUMBER: NJD 002185965 MANIFEST NUMBER: NJA 0268127
WASTE NAME: Waste Inhibited Hydrochloric Acid
WASTE ANALYSIS DATA: ATTACHED ☒ NOT AVAILABLE FOR THIS SHIPMENT

In accordance with 40 CFR 268, which governs the land disposal of certain untreated hazardous wastes this form is submitted to Du Pont Environmental Services. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

☒ I am a generator of a hazardous waste, identified above, that does not meet the applicable prohibition levels for "California List" wastes as set forth in 40 CFR 268.32 or RCRA section 3004. This notification is to inform Du Pont Environmental Services that I am sending Du Pont this waste stream, and this waste is prohibited from land disposal until the applicable prohibition levels shown below are met.

☒ Liquid hazardous waste having a pH \leq 2.0.

Liquid hazardous wastes containing the following metals (or elements) or compounds at concentrations greater than or equal to those specified below:

[]	Arsenic (as As)	\geq 500 mg/l
[]	Cadmium (as Cd)	\geq 100 mg/l
[]	Chromium (as Cr VI)	\geq 500 mg/l
[]	Lead (as Pb)	\geq 500 mg/l
[]	Mercury (as Hg)	\geq 20 mg/l
[]	Nickel (as Ni)	\geq 134 mg/l
[]	Selenium (as Se)	\geq 100 mg/l
[]	Thallium (as Th)	\geq 130 mg/l

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

- (2) ☒ This notification is to inform Du Pont that they are receiving the waste identified above which is a "California List" hazardous waste that has been treated to meet the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

<u>Harry W. McIlwain</u>	<u>Senior Consultant</u>	<u>5/17/90</u>
SIGNATURE	TITLE	DATE
006472:05/18/89		

ATTACHMENT 1

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

GENERATOR: E. I. duPont de Nemours & Co. Grasselli DU PONT APPROVAL NUMBER: OW 057
EPA ID NUMBER: NJD 002185-965 Plant MANIFEST NUMBER: NJA 0268125
WASTE NAME: Waste Inhibited Hydrochloric Acid
WASTE ANALYSIS DATA: ATTACHED X NOT AVAILABLE FOR THIS SHIPMENT

In accordance with 40 CFR 268, which governs the land disposal of certain untreated hazardous wastes this form is submitted to Du Pont Environmental Services. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

☒ I am a generator of a hazardous waste, identified above, that does not meet the applicable prohibition levels for "California List" wastes as set forth in 40 CFR 268.32 or RCRA section 3004. This notification is to inform Du Pont Environmental Services that I am sending Du Pont this waste stream, and this waste is prohibited from land disposal until the applicable prohibition levels shown below are met.

☒ Liquid hazardous waste having a pH \leq 2.0.

Liquid hazardous wastes containing the following metals (or elements) or compounds at concentrations greater than or equal to those specified below:

<input type="checkbox"/>	Arsenic (as As) \geq 500 mg/l
<input type="checkbox"/>	Cadmium (as Cd) \geq 100 mg/l
<input type="checkbox"/>	Chromium (as Cr VI) \geq 500 mg/l
<input type="checkbox"/>	Lead (as Pb) \geq 500 mg/l
<input type="checkbox"/>	Mercury (as Hg) \geq 20 mg/l
<input type="checkbox"/>	Nickel (as Ni) \geq 134 mg/l
<input type="checkbox"/>	Selenium (as Se) \geq 100 mg/l
<input type="checkbox"/>	Thallium (as Th) \geq 130 mg/l

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

(2) ☒ This notification is to inform Du Pont that they are receiving the waste identified above which is a "California List" hazardous waste that has been treated to meet the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Harry W. Mc Dowell
SIGNATURE

Senior Consultant
TITLE

5/17/90
DATE

ATTACHMENT 1

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

GENERATOR: E.I. du Pont de Nemours & Co. Grassell; DU PONT APPROVAL NUMBER: 0W 57
EPA ID NUMBER: NJD 002185965 Plant MANIFEST NUMBER: NJA 0451531
WASTE NAME: Waste Inhibited Hydrochloric Acid
WASTE ANALYSIS DATA: ATTACHED X NOT AVAILABLE FOR THIS SHIPMENT

In accordance with 40 CFR 268, which governs the land disposal of certain untreated hazardous wastes this form is submitted to Du Pont Environmental Services. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

☒ I am a generator of a hazardous waste, identified above, that does not meet the applicable prohibition levels for "California List" wastes as set forth in 40 CFR 268.32 or RCRA section 3004. This notification is to inform Du Pont Environmental Services that I am sending Du Pont this waste stream, and this waste is prohibited from land disposal until the applicable prohibition levels shown below are met.

☒ Liquid hazardous waste having a pH \leq 2.0.

Liquid hazardous wastes containing the following metals (or elements) or compounds at concentrations greater than or equal to those specified below:

<input type="checkbox"/>	Arsenic(as As)	$>$ 500 mg/l
<input type="checkbox"/>	Cadmium (as Cd)	$>$ 100 mg/l
<input type="checkbox"/>	Chromium (as Cr VI)	$>$ 500 mg/l
<input type="checkbox"/>	Lead (as Pb)	$>$ 500 mg/l
<input type="checkbox"/>	Mercury (as Hg)	$>$ 20 mg/l
<input type="checkbox"/>	Nickel (as Ni)	$>$ 134 mg/l
<input type="checkbox"/>	Selenium (as Se)	$>$ 100 mg/l
<input type="checkbox"/>	Thallium (as Th)	$>$ 130 mg/l

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

(2) ☒ This notification is to inform Du Pont that they are receiving the waste identified above which is a "California List" hazardous waste that has been treated to meet the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

<u>Harry W. McDowell</u>	<u>Senior Consultant</u>	<u>5/17/90</u>
SIGNATURE	TITLE	DATE
006472:05/18/89		

ATTACHMENT 1

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

GENERATOR: E.I. du Pont de Nemours & Co. Grasselli Plant DU PONT APPROVAL NUMBER: 0W057
EPA ID NUMBER: NJD 002185965 MANIFEST NUMBER: NJA 0654610
WASTE NAME: Waste Inhibited Hydrochloric Acid
WASTE ANALYSIS DATA: ATTACHED X NOT AVAILABLE FOR THIS SHIPMENT

In accordance with 40 CFR 268, which governs the land disposal of certain untreated hazardous wastes this form is submitted to Du Pont Environmental Services. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

- ☒ I am a generator of a hazardous waste, identified above, that does not meet the applicable prohibition levels for "California List" wastes as set forth in 40 CFR 268.32 or RCRA section 3004. This notification is to inform Du Pont Environmental Services that I am sending Du Pont this waste stream, and this waste is prohibited from land disposal until the applicable prohibition levels shown below are met.

☒ Liquid hazardous waste having a pH \leq 2.0.

Liquid hazardous wastes containing the following metals (or elements) or compounds at concentrations greater than or equal to those specified below:

[]	Arsenic (as As) \geq 500 mg/l
[]	Cadmium (as Cd) \geq 100 mg/l
[]	Chromium (as Cr VI) \geq 500 mg/l
[]	Lead (as Pb) \geq 500 mg/l
[]	Mercury (as Hg) \geq 20 mg/l
[]	Nickel (as Ni) \geq 134 mg/l
[]	Selenium (as Se) \geq 100 mg/l
[]	Thallium (as Th) \geq 130 mg/l

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

- (2) ☒ This notification is to inform Du Pont that they are receiving the waste identified above which is a "California List" hazardous waste that has been treated to meet the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

SIGNATURE

Harry W. Mc Dowell

TITLE

Senior Consultant

DATE

5/17/90

006472:05/18/89

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-229

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: E. I. DuPont de Nemours (Grasselli Plf.)
FILE NUMBER: 20-09-43
VHT FACILITY FILE NUMBER: _____
PERMIT #: _____
REGION: M
INSPECTION DATE: 4/24/90
INCIDENT/CASE NUMBER: _____
INSPECTION TYPE: Rn-L.B.
RESPONSIBLE AGENCY CODE: _____
INSPECTOR'S NAME: Dan Burgoyne
INSPECTOR'S AGENCY: DHNM
INSPECTOR'S BUREAU: MFO
EPA ID NUMBER: NTD 002185965
ADDRESS: Foot of S. Wood Ave.
Linden, N.J. 07036
LOT: 8,11 BLOCK: 586
COUNTY: Union
FACILITY PERSONNEL: Thomas A. Terrell Op. Mgr.
TELEPHONE #: (201) 474-1801 Harry McDowell DuPont Consultant
OTHER STATE/EPA PERSONNEL: N/A
REPORT PREPARED BY: Dan Burgoyne
REVIEWED BY: A. Stealing
DATE OF REVIEW: 6/8/90

REVISION: 3
01/88

JUN 07 1990

12/24
TIME IN: 0830

TIME OUT: 1730

PHOTOS TAKEN () YES (X) NO

IF YES, HOW MANY? _____

SAMPLE TAKEN () YES (X) NO

NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (X) YES () NO

Number of manifests in compliance 10

Number of manifests not in compliance 1

List manifest document numbers of those manifests not in compliance.

-A1-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS:

On 4/24/90 I conducted an inspection of Dupont in Linden. The purpose of the inspection was to determine regulatory compliance with N.J. hazardous waste generator requirements as established under N.J.A.C. 7:26-1 et seq., and USEPA land ban restriction requirements as established under 40 CFR Section 268 et seq. At the facility I met with Mr. Tom Terrell the Operations Mgr. and I explained the purpose of my visit.

Mr. Terrell stated that E.I. DuPont de Nemours & Co. Inc. has operated at this location since 1928 when the property was bought from Standard Chemical. The facility has phased down ^{over the last 10 years} from a multi-product chemical mfg. operation to a 3 product operation. The 3 products include a) H₂SO₄ b) ammonium thiosulfate c) sodium bisulfite. The plant currently employs 41 employees, the facility operates on 3 shifts - 7 days a week. The facility is also involved in transfer loading chlorosulfonic acid from rail tank cars to trucks and 55 gal. drums. The facility recently shut down the formaldehyde production plant (12/88). Formaldehyde was produced by oxidizing methanol over a silver catalyst bed (methanol as a vapor passed over bed).

Sulfuric acid is produced at the facility. Molten sulfur is transferred from concrete reinforced sulfur pits (can handle approx 60,000 lbs molten sulfur) to a hold tank (can handle 3,000 tons).

-A2-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS (continued):

The molten sulfur is then transferred to the contact plant. The sulfur is then burned at 800°C in a sulfur burner an air blower pulls in ambient air to be used in the drying tower. The burning of the molten sulfur produces SO_2 gas which is converted to SO_3 . The SO_3 gas is then passed through the oleum tower where SO_3 is passed through a fuming sulfuric acid mist. A Brinks denister is located at the top of the absorbing tower. The gases have a low vapor pressure and the H_2SO_4 mist coalesces small particles to larger particles. In this process 99% H_2SO_4 is produced and stored in a tank, also some oleum is produced. From the 3,000 ton batch of molten sulfur, 2,000 lbs of 99% H_2SO_4 is produced and 2,800 lbs of oleum. The strong acid can be diluted to produce weaker acids to be marketed. There is no containment around the storage tanks at the H_2SO_4 production area, but the facility does have an SPCC/OPCC plan. The facility has a NPDES PCT # 000704 for thermal surface H_2O discharge to the Arthur Kill. According to Mr Terrell any spills occurring as to acids are neutralized by applying limestone. The H_2SO_4 plant is located on the ^{north} east side of the facilities property. Shipments are taken off-site in 55 gal drums or in bulk via truck, railcar or barge. Hazardous waste from this area would be from cleaning proc. waste. In the western side of the facility is the ATS and SBS production plants (ammonium thiosulfate and sodium bisulfite).

-A3-

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS (continued):

In the ATS operation SO_2 gas from the H_2SO_4 plant is piped over and reacted with anhydrous ammonia forming ammonium bisulfate, the ammonium bisulfate is further reacted with addition (molten) sulfur then filtered producing ammonium thiosulfate. The ATS is then stored and can be shipped via railcar, truck ^{or barge} and some of the material is shipped in bladder bags.

In the SBS operation SO_2 gas from the H_2SO_4 plant is piped over to the SBS plant and circulated into a solution of soda ash, there is no reactors involved in this operation. In both the ATS and SBS processes there are scrubbing towers with packed media which contact the SO_2 gas with recirculated liquid. The SBS is stored and shipped off in small quantities (approx 10 gals) in bladder bags or in bulk via rail car, trucks, or barge. According to Mr Terrell there is no hazardous waste generated from these two processes.

Mr Terrell took me to the old laboratory (QALAC) which is no longer used and vacated. According to Mr Terrell the laboratory recently had asbestos removed from piping within this building some signs were found on the floor, I asked Mr Terrell if the building was safe to walk in without respiratory prot and protective suits, he stated the removal had been completed and deemed safe by the asbestos removal contractor Enviro Tech of N.J.

Inc. (License # 00180). The removed asbestos was placed in a dumpster (DUAL CO. NJDEP # 08138, phone # 701-874-1999) which was on-site at this time. The items no longer used were job packed by CWM- Newark. The materials were removed from the laboratory to a storage building located west of the lab. The 15 & 16 gal containers were labelled and all containers were in good condition. Waste types included D001, D002, D004, P018, and U012.

Mr Terrell then took me to facility warehouse, this is where raw materials and hazardous waste materials are kept. At this time there were 28-55 gal drums of haz. waste stored, 28 contained F003 (methanol & H₂O) and 6 drums contained caustic D002. There were other drums which Tom Terrell stated will be tested by CWM to determine if materials are hazardous, these were raw materials which hadn't been used. The drums were labelled and in good condition, not leaking and fully closed. The problem in this area however was lack of adequate aisle space. Mr Terrell was informed that this deficiency would be addressed on an NOV. After completing the plant inspection we returned to the main office to review the facilities haz. waste documentation. Mr Terrell introduced me to Mr Harry M^cDowell who was the former Env. Coordinator for Dupont returning ^{from retirement} at the Company's request.

to continue working in this capacity as a consultant.

After reviewing this information a few regulatory deficiencies were observed concerning

lack of personnel doc. for haz waste personnel, 1 manifest (#NJA 0541360) not being sent to the state of destination (West Virginia), no bi annual fire inspection, the semi-annual drills were ^{not} done with local authority participation, and the Contingency Plan failed to list the primary coordinator and give home addresses of each emergency coordinator. See attached list of citations and descriptions on the 4/24/90 NOV.

Another deficiency found was the lack of land ban restriction notices for 7 manifests (6 - acid waste D002, 1 methanol waste F003) representing 7 land ban restricted waste shipments. Copies of these manifests are attached to the land ban emb. check list. Facility has air pollution control permits, NJPDES permit, has submitted NJRTRK information, and no UST's. Annual reports attached.

-B-

Describe the activities that result in the generation of hazardous waste.

- tank cleanings and equipments - Foo3 generated once when closing 'Formaldehyde pH. (methanol & H₂O)
- lab packs being generated now due to closure of lab
- cleaning acid tanks and process equip. - D002 1 or 2 times a year
- oil spill clean-up & 175 soil excavation from leased out property to Conaco (DuPont subsidiary) case being handled by Gary Greulich and Brian Crisafulli and still active (see file)

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

- 22- 55 gal. drums of methanol & H₂O (tank cleaning of formaldehyde operation)
Foo3
- 6- 55 gal drums of caustic D002
- LAB PACK ITEMS
- 1- 15 gal D001 3- 16 gal D001
- 1- " " " / D002
- 4- " " D002 3- 16 gal. drums D002
- 1- 16 gal drum U012
- 1- 16 gal " P018

GENERAL

GENERAL CHECKLIST

		YES	NO	N/A
7:26-7.4(a)1	Does the Generator have an EPA ID number?	✓	—	—
HAZARDOUS WASTE DETERMINATION				
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	✓	—	—
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	✓	—	—
	Is the waste hazardous?	✓	—	—
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF? MSDS	✓	—	—
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	—	—	—
7:26-7.4(a)4i	The generator's name, address and phone number.	✓	—	—
7:26-7.4(a)4ii	The generator's EPA ID number.	✓	—	—
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓	—	—
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓	—	—
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓	—	—
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓	—	—
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓	—	—

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5i	Sign the manifest certification by hand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago? on 1 manifest	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

7:26-9.3

Accumulation Time

How is waste accumulated on site?

- ☒ Containers
- ☐ Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
- ☐ Tanks (less than 90 days)
- ☐ Above ground
- ☐ Below ground
- ☐ Surface impoundments
(complete HWMF (TSD) Facility Checklist)
- ☐ Piles (complete HWMF checklist)

7:26-9.3(a)1

Is waste accumulated for more than
90 days?YES NO N/A— ✓ —

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS
FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

<u>Containers</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone).		
A-16 gal drum 1012 1- " " " 1018 6- " " " 1012 2- 55 " " 1012 2- 55 " " 1012 7:26-9.4(d)2	5-16 gal drum lab pack 1001 2- " " " " " 1002 2- " " " " " 1004		
Do the containers appear to be in good condition, not in danger of leaking?			— — — ✓ — —
If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)4i	Are all containers securely closed except those in use?		
7:26-9.4(d)4i1i	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?		
7:26-9.4(d)4iv	Are containerized hazardous wastes segregated in storage by waste type?		
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?		
7:26-9.4(d)5	Is the container storage area inspected at least daily?		
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?		
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?		
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?		

		YES	NO	N/A
7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)	—	—	✓
<u>Tanks</u> (Less than 90 day storage)				
7:26-9.3(b)	Does the generator accumulate hazardous waste on-site in an above ground tank?	—	—	✓
	If yes, describe the tank(s):			
	1) Capacity			
	2) Shell thickness			
	3) Material Construction			
	4) Age of tank			
7:26-9.3(b)	Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?	—	—	—
7:26-9.3(b)1	Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?	—	—	—
7:26-9.3(b)4	Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?	—	—	—
7:26-9.3(b)5	Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?	—	—	—
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?	—	—	—
7:26-9.3(b)8	If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is secondary containment provided for the below grade part?	—	—	—
7:26-10.5(c)1	Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?	—	—	—
7:26-10.5(c)2	Does the generator use appropriate controls and practices to prevent overfilling?	—	—	—

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-10.5(c)211	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?	—	—	✓
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	—	—	—
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	—	—	—
7:26-10.5(d)11	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	—	—	—
7:26-10.5(d)11	Does the containment system consist of material compatible with the wastes being stored?	—	—	—
7:26-10.5(d)111	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?	—	—	—
7:26-10.5(d)111	Is the tank protected from contact with accumulated liquids?	—	—	—
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	—	—	—
7:26-10.5(d)2	Is run-on into the containment area prevented?	—	—	—
	If not, explain.	—	—	—
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?	—	—	—
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	—	—	↓

YES NO N/A

- 7:26-10.5(d)41 If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter? ✓
- 7:26-9.4(g)4 Personnel Training
- Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility? ✓
- 7:26-9.4(g)5 Has facility personnel taken part in an annual review of initial training? ✓
- 7:26-9.4(g)2 Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed? ✓
- Is there written documentation of the following:
- 7:26-9.4(g)61 Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job? ✓
- 7:26-9.4(g)611 A written job description for each position related to hazardous waste management? ✓
- 7:26-9.4(g)6111 A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management? ✓
- 7:26-9.4(g)61v Documentation of actual training or experience received by personnel? ✓
- 7:26-9.4(g)7 Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment? ✓

YES NO N/A

7:26-9.6

Preparedness and prevention

Does the facility comply with preparedness and prevention requirements including maintaining:

7:26-96(b)1

An internal communications or alarm system?

✓ — —

7:26-9.6(b)2

A telephone or other device to summon emergency assistance from local authorities?

✓ — —

7:26-9.6(b)3

Portable fire equipment, spill control equipment, and decontamination equipment?

✓ — —

7:26-9.6(b)4

Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?

✓ — —

7:26-9.6(c)

Is equipment tested and maintained?

✓ — —

7:26-9.6(d)1

Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?

✓ — —

7:26-9.6(e)

Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?

— ✓ —

If no, please explain.

In your opinion, do the types of waste on site require all of the above procedures, or are some not required?

✓ — —

Explain.

7:26-9.6(f)

Has the facility made the following arrangements, as appropriate for the type waste handled on site:

— — —

7:26-9.6(f)1

Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.

✓ — —

YES NO N/A

- 7:26-9.6(f)2 Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority? ✓
- 7:26-9.6(f)3 Agreements with emergency response contractors, and equipment supplies? ✓
- 7:26-9.6(f)4 ^{OH materials} ^{CNM} ^{LEMAC (EXXON, DUPONT, POLICE, FIRE, MAR, Amer Cy)} Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility? ✓
- 7:26-9.6(f)5 Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually? ✓
- 7:26-9.6(f)6 If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record. ✓
- 7:26-9.4(g)8 Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7? ✓
- 7:26-9.4(g)81 If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement? ✓
- 7:26-9.4(g)811 Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements? ✓
- If yes, did the owner operator provide those specific local officials with written approval of the exemption? ✓

YES NO N/A

7:26-9.7

Contingency Plan and Emergency Procedures

7:26-9.7(a)

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?

☒ _ _ _

7:26-9.7(b)

Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?

☒ _ _ _

7:26-9.7(c)

Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?

☒ _ _ _

7:26-9.7(d)

Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.

☒ _ _ _

If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?

☒ _ _ _

7:26-9.7(e)

Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?

☒ _ _ _

YES NO N/A

7:26-9.7(f)

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?

home address

✓

7:26-9.7(g)

Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?

✓

7:26-9.7(h)

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routes could be blocked by releases of hazardous waste or fires)?

✓

7:26-9.7(i)

Is a copy of the contingency plan and all revisions to the plan:

1. Maintained at the facility;
2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?

✓

✓

7:26-9.7(k)

Is there an employee on site or on call at all times with the responsibility of coordinating all emergency response measures?

✓

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methanol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

N/A

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

☐ Yes ☒ No
☐ Yes ☒ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

☐ Yes ☒ No
☐ Yes ☒ No
☐ Yes ☒ No
☐ Yes ☒ No
☐ Yes ☒ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

☐ Yes ☒ No

If yes, list the constituents.

- (b) Are the constituents used for degreasing/cleaning?

☐ Yes ☒ No

If yes, list the constituents.

- (c) Are the constituents used as diluents?

☐ Yes ☒ No

If yes, list the constituents.

- (d) Are the constituents used as extractants?

☐ Yes ☒ No

If yes, list the constituents.

(e) Are the constituents used for fabric scouring?
____ Yes ☒ No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?
____ Yes ____ No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)
____ Yes ____ No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

N/A



If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

N/A



**APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS**

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Inspector: Dan Burgoyne
Address: Metro Field Office
2 Babcock Pl., W. Orange, N.J.
Telephone No: 201-669-3960

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name E.I. Dupont & Nemours & Company B. Street (or other identifier) Foot of S. Wood Ave.
C. City Lindden D. State N.J. E. Zip Code 07036 F. County Name Union
G. Nature of Business; Identification of Operations: SIC Code(s) Chemical Mfg.
H. EPA ID # MSD 000185965
I. Handler Contact (Name and Phone Number) Mr. Thomas A. Terrell (201) 474-1801

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(1) ~~F001, F002, F004, or F005~~ Yes ☒ No

(11) F003 methanol at. ☒ Yes ☐ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

Yes ☐ No ☒

but discontinued product as of 1988 last shipment off-site early 1989

N/A

b. Source of the above: Form 8700-12 ; Part A ; Part B ; Biennial/Annual Reports ☒
other (specify) ☒ manifests

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below:

10/14

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ☐ Yes ☒ No

(ii) F028 ☐ Yes ☒ No

[F-solvent BD&T standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 (acids) ☒ Yes ☐ No

(ii) D004 - D011 ☐ Yes ☒ No

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides?

[California waste standards are presented as Appendix C] ☐ Yes ☒ No

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code.

☐ Yes ☐ No

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(1)]?

☒ Yes ☐ No*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes?

☐ Yes ☒ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

☒ Yes ☐ No

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

MSDS sheets for all chemicals

- f. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report ☒; other (specify) ✓. MSDS sheets

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

NO

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

NO

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ☐ Yes ☐ No

N/A

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ☐ Yes ☐ No*

- e. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report _____; other (specify) _____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☐ Yes ☐ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ☐ Yes ☐ No*

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

3. F Solvents -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☒ Yes ☐ No*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?

☒ Yes ☐ No*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?

☒ Yes ☐ No*

- b. Does the facility handle K061 wastes?

☐ Yes ☒ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?

☐ Yes ☐ No*

- c. Does the facility handle K101 or K102 wastes?

☐ Yes ☒ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?

☐ Yes ☐ No*

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

☐ Yes ☒ No

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☒ Yes ☐ No

- (i) List wastes for which "applied knowledge" was used:

D002 - HCL
R003 - methanol

b. TCLP ☐ Yes ☒ No

- (i) List wastes for which "TCLP" was used:

- (ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☒ No

- d. If files were retained, describe content and basis of applied knowledge determination:

MSDS sheets for
HCL - wash water for descaling No. 1 tanks
R003 - clean out of material tank, scrapped

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

N/A

N/A

N/A

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

- e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?
_____ Yes _____ No* *P/N*

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: D002, F003

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]
_____ Yes* ☒ No

D. Management

1. Onsite management

- a. Were restricted wastes managed onsite?
_____ Yes ☒ No

If no, go to "2".

- b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?
_____ Yes ☒ No

If yes, TSDP checklist must be completed.

2. Offsite Management

- a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? _____ Yes ☒ No*

(ii) Corresponding treatment standard? _____ Yes ☒ No*

(iii) Manifest number? _____ Yes ☒ No*

(iv) Waste analysis, if available? _____ Yes _____ No

no land ban

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

Identify offsite treatment facilities

HEL, carbosulfonic acid Report Chankers works facility

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

N/A

- (i) EPA hazardous waste I.D. number? ☐ Yes ☐ No*
- (ii) Corresponding treatment standard? ☐ Yes ☐ No*
- (iii) Manifest number ☐ Yes ☐ No*
- (iii) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No*

Identify land disposal facilities receiving the BDAT certified wastes

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No*
- (ii) Corresponding Treatment Standards? ☐ Yes ☐ No*
- (iii) All applicable prohibitions? ☐ Yes ☐ No*
- (iv) The manifest number? ☐ Yes ☐ No*
- (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No*
- (vi) Does generator keep records of all notifications/certifications send to offsite facilities? ☐ Yes ☐ No*

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b)]:

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ☐ Yes ☐ No*

Applicable prohibitions? ☐ Yes ☐ No*

The manifest number? ☐ Yes ☐ No*

Waste analysis data, where available? ☐ Yes ☐ No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposal in a landfill or surface impoundment [§268.33(f)]? ☐ Yes ☐ No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ☐ Yes ☐ No*

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No*

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? ☐ Yes ☐ No*

2. A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No*

- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? ☐ Yes ☐ No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☒ No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ☐ Yes ☐ No*

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☐ Yes ☐ No

If yes, list type of treatment unit and processes

If yes, TSDF checklist must be completed.

N/A

N/A

**State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625**

622-001
No. 10-13-87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D0002185965		Manifest Document No. 2 Page 1 of 1		Information in the shaded areas is required by Federal law.	
3. Generator's Name and Mailing Address: DUPONT GRASSELLI PLANT FOOT OF S. WOOD AVE. LINDEN, N.J. 07036		6. US EPA ID Number PA D084720023		A. State Manifest Document Number NJA-0388043		B. State Generator's ID Number SA 0000000000	
4. Generator's Phone 201-474-1806		7. Transporter 1 Company Name CHEMICAL LEAMAN		C. State Transporter's ID Number SA 0000000000		D. Transporter's Phone 609-677-1111	
5. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID Number		F. Transporter's Phone	
9. Designated Facility Name and Site Address: DUPONT CHAMBERS WORK DEERWATER, N.J.		10. US EPA ID Number NJ D0002385730		G. State Facility's ID Number SA 0000000000		H. Facility's Phone 609-677-2669	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Units	
a. WASTE SULFURIC ACID CORROSIVE MATERIAL UN 1830		No. 1 Type FT		33280 LB		LA D002	
b.							
c.							
d.							
15. Special Handling Instructions and Additional Information CONTRACT NUMBER OW 622-001 PERMIT NO. TPL 3021 (21831) SEAL No. 270356		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name RONALD W. TITUS		Signature <i>Ronald W. Titus</i>		Month Day Year 10/11/87			
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name HARTLEY H. HIES		Signature <i>Hartley H. Hies</i>		Month Day Year 10/11/87	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name Schweitzer		Signature <i>Schweitzer</i>		Month Day Year 10/14/87	



State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625

OW 622-002

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MJD1010211859151		Manifest Document No.		2. Page 1 of 1 Information in the shaded areas of this form is not required by Federal law.	
3. Generator's Name and Address DUPONT GRASSMILL PLANT FOOT OF S. WOOD AVE. LINDEN, N.J. 07036		4. Generator's Phone 908-774-1806		5. Transporter 1 Company Name CHEMICAL LEAMAN		6. Transporter 1 US EPA ID Number PA101084770023	
7. Designated Facility Name and Site Address DUPONT CHAMBERS WORKS DEEPWATER, N.J.		8. Designated Facility US EPA ID Number NJ1010213852310		9. State Facility's Phone 609-540-2668		10. State Facility's Name DEPT. OF ENVIRONMENTAL PROTECTION	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Waste No.	
a. WASTE SULFURIC ACID CORROSIVE MAT'L UN1830		No. Type		Unit		Waste No.	
b. 11 TIT 145810 LB D002							
c.							
d.							
J. Additional Descriptions of Materials Listed Above		K. Handling Codes for Wastes Listed Above		701			
15. Special Handling Instructions and Additional Information CONTRACT No. OW 622-002 PERMIT No. TAL 3021 21831		SEAL No OWD 270076		4 JUN 187027			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name RONALD W. TITUS		Signature <i>Ronald W. Titus</i>		Month Day Year 10/8/1987			
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name VANCE POSTELL		Signature <i>Vance Postell</i>		Month Day Year 10/8/20/87	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name J. CRAWFORD		Signature <i>J. Crawford</i>		Month Day Year 10/20/87			

State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 026 Trenton, NJ 08646

GENERAL INFORMATION No CDR

Form Approved OMB No 2050-0030

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. NJD 0021859610	
Generator's Name and Address E.I. DUPONT DE NEMOURS & CO. INC. SOUTH WOOD AVE LINDEN, N.J. 07036		US EPA ID Number	
Transporter's Name and Address CHAMBERS WORKS, INC. DEERWATER, NJ 08023		US EPA ID Number	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Waste, UNHABITED HYDROCHLORIC ACID UN 1789 CORROSIVE		12. Container or Package Information Total Quantity 1105000 g	
13. Additional Information Waste, UNHABITED HYDROCHLORIC ACID UN 1789 CORROSIVE		14. Additional Information	
15. Generator's Certification I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the applicable method of treatment, storage, or disposal which is available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		16. Transporter's Certification I am a large quantity transporter. I certify that I have a program in place to reduce the volume and toxicity of waste transported to the degree I have determined to be economically practicable and that I have selected the applicable method of treatment, storage, or disposal which is available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity transporter, I have made a good faith effort to minimize my waste transportation and select the best waste management method that is available to me and that I can afford.	
Printed/Typed Name CARL H. WALLING JR		Signature <i>(Signature)</i>	
Printed/Typed Name DWIGHT S. HUGHES		Signature <i>(Signature)</i>	
Printed/Typed Name J. J. H.		Signature <i>(Signature)</i>	



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

NO COR
057-063

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address E.I. DUPONT DE NEMOURS & CO. INC. SOUTH WOOD AVE LINCOLN, N.J. 07036		1. Generator's US EPA ID No. NJ100001859000000		A. State Manifest Document Number NJ1000018531		
4. Generator's Phone NAPPI TRUCKING CORP		5. Transporter 1 Company Name NAPPI TRUCKING CORP		B. State Generator's ID		
6. Transporter 1 US EPA ID Number NJ100000812477		7. Transporter 2 Company Name		C. State Facility ID		
8. Transporter 2 US EPA ID Number		9. Designated Facility Name and Site Address E.I. DUPONT DE NEMOURS & CO. INC. CHAMBERS WORKS, ROUTE 130 DEERHATER, NJ 08023		D. Transporter 1 Phone		
10. US EPA ID Number		10. US EPA ID Number		E. State Facility ID		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type		13. Total Quantity Unit Wt/Vol		
a. WASTE INHIBITED HYDROCHLORIC ACID UN 1789 CORROSIVE		12. Containers No. Type		13. Total Quantity Unit Wt/Vol		
b.		12. Containers No. Type		13. Total Quantity Unit Wt/Vol		
c.		12. Containers No. Type		13. Total Quantity Unit Wt/Vol		
d.		12. Containers No. Type		13. Total Quantity Unit Wt/Vol		
J. Additional Descriptions for Materials Listed Above a. 5% HCl 95% WASH WATER		K. Handling Codes for Waste Above T.O.		b.		
b.		c.		d.		
15. Special Handling Instructions and Additional Information DUPONT CONTRACT NO OW 57, REL 063 DECAL # TEMP SEAL NO OWD OWD 315143						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name STEVEN P. GREINER		Signature Steven P. Greiner		Month Day Year 11 02 51 88		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name THOMAS FRAGASSO		Signature Thomas Fragasso		Month Day Year 11 02 51 88		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 15 Printed/Typed Name T. P. ...						
Printed/Typed Name		Signature		Month Day Year		

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5580 (Day) (609) 292-7172 (Night)

State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 020, Trenton, NJ 08625

Please print or type (Form 8700-22, Rev. 8-86) (12-inch typewriter)

Form Approved OMB No. 2050-0033 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFESTATION FORM 1. Generator's US EPA ID No. NJD101012118519651010101 2. Manifest Number 17741640 P 3. Generator's Name E. I. DENEMOURS & CO. INC. 4. Generator's Address SOUTH WOOD AVE, LINDEN, NJ 07036 5. Generator's Phone 201-862-1700 6. US EPA ID Number NJD101012118519651010101 7. Transporter's US EPA ID No. NJD101012118519651010101 8. Transporter's Name CHAMBERS WORKS, ROUTE 130, DEERHART, NJ 08023 9. Designated Facility's US EPA ID No. NJD101012118519651010101 10. Designated Facility's Name CHAMBERS WORKS, ROUTE 130, DEERHART, NJ 08023 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. WASTE INHIBITED HYDROCHLORIC ACID UN1785 CORROSIVE b. 17741640 P c. 17741640 P d. 17741640 P 12. Container's US EPA ID No. 17741640 P 13. Container's Name 17741640 P 14. Container's Address 17741640 P 15. Special Handling Instructions and Additional Information CONTRACT NUMBER 057 REL 126 SEAL NO. 047 244585 23231 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packed, marked, and labeled, and are, in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize the waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Carl H. HUNTER JR. Signature Carl H. Hunter Jr. Month/Day/Year 1/01/87 17. Transporter's Acknowledgment of Receipt of Materials Printed/Typed Name DANIEL E. DOWELL Signature Daniel E. Dowell Month/Day/Year 1/01/87 18. Facility's Acknowledgment of Receipt of Materials Printed/Typed Name DANIEL E. DOWELL Signature Daniel E. Dowell Month/Day/Year 1/01/87 19. Facility's Certification of Receipt of Hazardous Materials covered by this manifest except as noted in item 18. Printed/Typed Name DANIEL E. DOWELL Signature Daniel E. Dowell Month/Day/Year 1/01/87 20. Facility's Certification of Receipt of Hazardous Materials covered by this manifest except as noted in item 18. Printed/Typed Name DANIEL E. DOWELL Signature Daniel E. Dowell Month/Day/Year 1/01/87	
---	--

W. L. DQ

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-8

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ0000210594090001	Manifest Document No. 1 of 1	2. Page 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address E.I. DUPONT NEMOURS & CO., INC. GRASSILLI PLANT, LINDEN, N.J. 07036			A. State Manifest Document Number NJ0656610		
4. Generator's Phone (201) 474-1840			B. State Generator's ID SAME		
5. Transporter 1 Company Name FREEHOLD CARTAGE INC.			6. US EPA ID Number NJ00004126164		
7. Transporter 2 Company Name			8. US EPA ID Number		
9. Designated Facility Name and Site Address E.I. DUPONT NEMOURS & CO., INC. CHARLENS WORKS, RT 130 DEERWATER, N.J. 08023			10. US EPA ID Number NJ00002395720		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM			12. Containers		
			No	Type	13. Total Quantity
a. X WASTE HYDROCHLORIC ACID SOLUTION IN MIXED UN 1789 COMPOSITE			001	TT	05000 G
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above 52 HCL 152 WASTE WATER			K. Handling Codes for Wastes Listed Above		
a.			a.		
b.			b.		
15. Special Handling Instructions and Additional Information CURRENT CONTAINMENT TANKS RELEASE # 0074			ISAL # QWD385138		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name			Signature		
T. J. JONES			[Signature]		
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name			Signature		
HAROLD GIBSON			[Signature]		
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name			Signature		
19. Discrepancy Indication Space					
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name			Signature		

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

NO LDR

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0035 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.	Manifest Number	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address E.I. DUPONT DE NEMOURS & CO. CRASSELL PLANT LINDEN, NJ		NS 00021859657		Document Number 0541360	
4. Generator's Phone 301 474-1751		6. US EPA ID Number TX 0090030667			
5. Transporter 1 Company Name CONCO		8. US EPA ID Number			
7. Transporter 2 Company Name		10. US EPA ID Number			
9. Designated Facility Name and Site Address E.I. DUPONT DE NEMOURS 901 WEST DUPONT AVE BELLE, WV 25015		WV 0005012851			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM a. X RQ WASTE METHANOL + WATER FLAMMABLE MATERIAL UN 1230		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol
		001TT		19060	P
Additional Description for Materials Listed Above ID # 172		Handling Codes for Waste			
Special Handling Instructions and Additional Information Dupont Contract # OWT 8903					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name: MARTIN O. KITCHEN Signature: [Signature] Month Day Year: 04/10/89					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: DAVID KOSWISKI Signature: [Signature] Month Day Year: 12/2/89					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: [Blank] Signature: [Blank] Month Day Year: [Blank]					
19. Discrepancy Indication Space PAGE NUMBER NOT LISTED ON MANIFEST					
20. Facility Owner or Operator Certification of receipt of hazardous materials Printed/Typed Name: S. SHAFFER Signature: [Signature]					

In case of an emergency call the state fire emergency number 1-800-368-7233. In case of a hazardous waste emergency call the state fire emergency number 1-800-368-7233.

NJA 0541360

2 Babcock Place, West Orange
N.J., 07052

NOTICE OF VIOLATION

ID NO. NTD 002185965 DATE 4/24/90
NAME OF FACILITY E.I. Dupont de Nemours & Company (Crasselli Plt.)
LOCATION OF FACILITY East of South Wood Avenue, Linden
NAME OF OPERATOR Mr Thomas Jarrell

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION 7:26-7.4(a)5iii Facility failed to send a copy of manifest # NTA 0541360 to the state of destination (West Virginia).
7:26-9.4(g)6i Facility failed to have written docum. as to job title for each haz. waste mgmt. position & employee name. 7:26-9.4(g)6ii Facility failed to have a written job description for each haz. waste mgmt. position. 7:26-9.6(e) Facility failed to provide adequate aisle space (at least 18") between haz. waste storage containers. 7:26-9.6(f)5 Facility failed to arrange to have a fire insp. annually. 7:26-9.4(g)8 Facility failed to have semi-annual drills involving local authorities (police & fire). 7:26-9.7(f) Facilities Cont. Plan does not list primary or give home address of e.r. coordinator.
Remedial action to correct these violations must be initiated immediately and be completed by May 24, 1990. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$25,000 per violation.

David J. Buzzyne
Division of Hazardous Waste Management
Department of Environmental Protection

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
2 Babcock Place
West Orange, N.J. 07052
(201) 669-3960



NOTICE OF VIOLATION

ID NO. NJD 002185-965 DATE 5/24/90
NAME OF FACILITY E.I. DuPont de Nemours & Company Inc.
LOCATION OF FACILITY Foot of Sixth Wood Ave., Linden
NAME OF OPERATOR Mr Thomas Terrell

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION 7:26-9.3(d)4 Facility failed to mark
all containers with the words hazardous waste (specifically 1 drum)
7:26-9.4(d)2 Facility failed to transfer or over pack a
drum found to be leaking and not in good condition (1 drum)
7:26-9.4(d)4i Facility failed to securely close all hazardous
waste containers in order to prevent the escape of hazardous waste.
(3 drums)

Remedial action to correct these violations must be initiated immediately and be completed by 5/29/90. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Daniel J. Benzinger
Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

MEMONEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO NFO File # 20-09-43
FROM Dan Burgoyne thru Jeff Speding AB DATE 6/7/90
SUBJECT E.I. Dupont Linden F.V. insp. conducted 5/31/90

The facility was found to be in full compliance with
chrom violations observed on the 5/24/90 F.V. insp.

Areas of Compliance

7:20 - 9.3 (d) 4

11 - 9.4 (d) 2

11 - 9.4 (d) 4;

No further ent. action required.

MEMONEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTIONTO MFO File #20-09-43FROM Dan Burgoyne thru Jeff Sterling 748 DATE 6/7/90SUBJECT E.I. DuPont de Nemours & Co. Inc. Linden F.U. insp. conducted 5/24/90

The facility had complied with the regulatory deficiencies observed on the 4/24/90 inspection listed below:

Areas of Compliance

Title- 7.4(a) 5iii

7.26-9.6(f) 5

" - 9.4(g) 6i

" - 9.4(g) 8

" - 9.4(g) 6ii

" - 9.7(f)

" - 9.6(e)

However 3 new drum violations were observed

Areas Not in Compliance

7.26- 9.3 (d) 4

" - 9.4 (d) 2

" - 9.4 (d) 4i

An NOV was issued with compliance date
of 5/29/90